



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

0000060

REPLY TO THE ATTENTION OF

HSRL-6J

July 6, 1994

EPA Region 5 Records Ctr.



207027

Mr. Alan P. Bielawski, Esq.  
Sidley & Austin  
One First National Plaza  
Chicago, Illinois 60603

**Re: Approval of Field Sampling Plan Addendum  
Lenz Oil Site  
Lemont, Illinois**

Dear Mr. Bielawski:

This letter serves to document that U.S. EPA has reviewed and approves of the revised Field Sampling Plan Addendum (FSP), dated June 27, 1994, which was prepared by Environmental Resources Management, Inc. for the Lenz Oil site. Illinois EPA has also reviewed the document and concurs with the approval. Several important points and clarifications that I would like to draw your attention to are listed below.

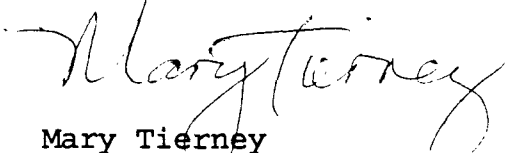
1. Approval of the FSP is granted with the assumption that if the sampling strategy does not sufficiently characterize the nature and extent of the NAPL plume emanating from the Lenz Oil site, and as a consequence an adequate Feasibility Study report cannot be completed, U.S. EPA may require the Respondents to conduct additional work pursuant to Section IX of the Consent Order.
2. In order to accurately estimate the volume of NAPL that may need to be remediated, the outer limits and areal extent of the NAPL plume must be delineated. As provided for on page 10 of the revised FSP, based on the results from the NAPL sampling, "additional piezometers may be installed if NAPL is detected in any of the outer ring piezometers".
3. The Respondents retain ultimate responsibility for any deficiencies in the methods selected for determination of the NAPL thickness. If, for example, field measurements or computer-generated figures for NAPL thickness provide an

inaccurate estimate of the NAPL volume, the Respondents shall be required to either conduct additional field work, choose a different method for determination of NAPL thickness, or accept the effect(s) that an inaccurate estimate may have on the soundness of the selection of the most appropriate and cost-effective remedy.

4. Respondents are responsible for ensuring that all data necessary for running the ARMOS model are accurate, complete, and appropriate.
5. According to a statement on page 13 of the FSP, specific gravity is considered to be the highest priority parameter. Another statement at the bottom of page 10 of the FSP, however, provides that "a sample for specific gravity analysis will be collected at each location where sufficient volume of NAPL is present". I am taking this statement to mean that a separate sample for specific gravity analysis will be collected only at those sample locations where sufficient volume is present. At those locations where sufficient sample is not present, a portion of the sample from either a VOC or SVOC sample container shall be used for the specific gravity analysis.
6. The Respondents shall give the U.S. EPA oversight contractor the opportunity to collect split samples at any of the sample locations, pursuant to Section XV of the Consent Order. U.S. EPA may request that split samples for one or more of the high priority parameters be collected before the Respondents fill their sample containers for lower priority parameters. The oversight contractor, in consultation with U.S. EPA, will determine whether this is necessary based on field conditions and volume of NAPL encountered.
7. Delays in completion of field work due to high water levels shall not affect the schedule for completion of the Feasibility Study report unless written approval is received from U.S. EPA. As stated on page 3 of the FSP, in the event that field work is delayed for this reason, a revised schedule will be submitted to U.S. EPA for review and approval. The Respondents are advised to use any "down time" which may occur to initiate preparation of the technical memorandum and/or FS report so that the documents can be completed on schedule. Preparation of the document(s) may also be undertaken while data validation activities are in progress. In short, the Respondents should take all appropriate steps to ensure that completion of the Feasibility Study report is not delayed.
8. The proposed schedule in the FSP does not allow time for Agency review of the technical memorandum. Two weeks shall be allowed for review of the memo, which shifts the submittal date for the draft Feasibility Study to December 9, 1994.

Please contact me if you have any comments or questions regarding the above matters. As indicated in the FSP schedule, initiation of field work is planned for July 25, 1994. If any change in this start date is anticipated, please notify U.S. EPA immediately. I can be contacted at (312) 886-4785 if you have any questions or would like to discuss these matters further.

Sincerely,

A handwritten signature in cursive script, reading "Mary Tierney".

Mary Tierney  
Remedial Project Manager

cc: Stuart Hersh, U.S. EPA  
Kerry Street, U.S. EPA  
Jerry Willman, IEPA  
John Chitwood, BVWS, Inc.  
John Imse, ERM-North Central, Inc.